



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 5, 2013

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BY E-MAIL

The Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2202  
New York, New York 10007

Re: United States v. Alimzhan Tokhtakhounov et al.,  
13 Cr. 268 (JMF)

Dear Judge Furman:

The Government writes regarding the bail conditions for defendant Eugene Trincher. At the defendant's April 16, 2013 presentment in the Central District of California, the Court set bail conditions that included the following:

- a \$50,000 appearance bond, co-signed by one person;
- travel restricted to the Central District of California and the Southern District of New York;
- the defendant to surrender all travel documents and make no new applications;
- the defendant to maintain or actively seek employment and provide proof to Pre-Trial Services; and
- the defendant to have no contact with victims, witnesses, and co-defendants (except in the presence of counsel and except family members).

On April 29, 2013, Your Honor ordered that these conditions be continued until the defendant retained counsel.

As discussed at the June 3, 2013 conference, the Government has conferred with the defendant's recently retained counsel regarding an appropriate bail package for this District. The parties jointly propose the following bail conditions for the Court's consideration:

- a \$300,000 personal recognizance bond, co-signed by two financially responsible persons by June 21, 2013;
- travel restricted to the Central District of California and the Southern and Eastern Districts of New York;
- strict Pre-Trial supervision;

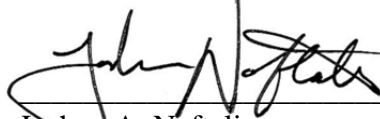
- drug testing and treatment, as appropriate;
- the defendant to surrender all travel documents and make no new applications; and
- the defendant to have no contact with victims, witnesses, and co-defendants (except in the presence of counsel and except family members).

The Government is of course available for a conference regarding this matter.

Respectfully submitted,

PREET BHARARA  
United States Attorney

By:



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cc: Donald Re, Esq.

SO ORDERED:



The Honorable Jesse M. Furman  
United States District Court

June 6, 2013